

August 14, 2001

Ms. Carole J. Washburn, Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Re: Docket No. U-991301

Dear Ms. Washburn:

Cascade Natural Gas Corporation (Cascade) submits the following comments in response to the Notice of Opportunity to File Written Comments in the above-referenced docket.

480-90-19U Posting of tariffs for public inspection and review

Cascade's concerns with the proposed rule relates to the availability of "all current cancelled sheets" on the Company's website or in each of its local offices. The phrase "current cancelled sheets" implies all sheets that have ever been in effect in the tariff, which for Cascade dates back to 1963. Currently, Cascade maintains all of its cancelled tariff sheets in its corporate offices and, upon request, provides copies of them to customers free of charge.

The Company does not post its historical tariffs on its website nor does it see the value of providing such information through this medium. The Company believes inclusion of this information would not only be costly and burdensome but also confusing to customers.

In order to provide such information, Cascade's new website, launched August 6, 2001, would need to be redesigned to include an additional section for cancelled tariffs (estimated to cost \$5,000 to \$10,000). Additionally, there are the costs associated with transferring the information from hardcopy to electronic format (38 years worth of revisions for Cascade). It is estimated this task would require 3 to 6 months to complete.

If a customer is concerned about a prior rate, it is actually better for them to contact the utility since a number of the rate schedules are subject to temporary adjustments that are shown on separate sheets and have various effective dates. Providing a customer access to this information on the web, without the utility to assist them in going through the documents, will likely lead to more confusion.

Additionally, maintaining the cancelled sheets in the local offices will be an administrative burden with no benefit to customers. Currently, each of Cascade's local offices has a copy of the current tariffs available for customer inspection, however, they do not maintain copies of the cancelled

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sheets. Customers rarely go to the local offices asking to see the Company's tariffs; only 3 customers have visited Cascade's local offices (14) requesting to see the current tariff. Customers have never gone to the local office requesting to see the cancelled sheets.

Cascade believes its current procedure of maintaining this historical information at its corporate office and providing it to customers upon request is most efficient.

Gas Customer Notification Requirements (480-90-19V & W)

In regards to the customer notification rules, Cascade has two concerns. First, the proposed rules do not clearly identify the notification procedures for changes in federal, state, county, or city imposed taxes, fees or surcharges. Previous drafts of the customer notice rules had clearly identified such charges as items requiring notice after Commission approval. Since the original purpose of this rulemaking was to clarify the rules, it seems appropriate to list these items separately under 480-90-19W.

Secondly, Cascade still has concerns about Staff's proposal in WAC 480-90-19V. Specifically, the proposal will not allow for the use of bill inserts, unless the Company delays the filing by 30 days. The existing notification rules do not require, nor do they infer, that each customer be notified 30 days prior to the effective date of the filing. The only way to accomplish this would be to delay the filing by 30 days or direct mail notices to each customer, which is a more costly endeavor.

Although subsection 2 allows for "Published Notification", it is unlikely that it represents a viable option as it requires both newspaper (requirement b) along with television and radio announcements (requirement c) in all geographical areas. The four requirements on an individual basis may not be unreasonable. However, requiring all four to be met will basically force the utilities back to the individual notification requirements found in subsection 1, as items b & c would be even more costly.

Cascade supports Staff's endeavors to enhance consumer education and improve customer communication when the utility changes its rates or services. However, staff has proposed a rule revision that in practice would directly contradict statutory rules governing tariff filing requirements, or would otherwise force the utility into incurring the highest cost option available for customer notification purposes.

Cascade appreciates the opportunity to comment on the proposed rules. If you have any questions, please contact Katherine Barnard at (206) 381-6824.

Sincerely,

Jon T. Stoltz
Sr. Vice President,
Planning, Regulatory and Consumer Affairs

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